

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
ANDRZEJ BORKOWSKI,

Plaintiffs,

-against-

100 CHURCH, LLC, ET AL,

Defendant.

See Rider Attached.

Case No.:  
21 MC 102 (AKH)

Docket No.: 07CV1472

NOTICE OF ADOPTION OF  
ANSWER TO MASTER  
COMPLAINT

-----X Jury Trial Demanded

Defendants, TRIBECA NORTH END, LLC, BOARD OF MANAGERS OF THE HUDSON VIEW EAST CONDOMINIUM, HUDSON VIEW EAST CONDOMINIUM, by their attorneys, CALLAN, KOSTER, BRADY & BRENNAN, LLP, adopts its Answer to the Master Complaint served by the answering defendants in 21 MC 102 (AKH) as its answer to the allegations set forth in the Complaint by Adoption (Check-Off Complaint). Pursuant to Case Management Order No. 4, this adoption of answer to the Master Complaint is deemed to deny the allegations of the Check-Off Complaint in this case. To the extent that defendants' Answer to the Master Complaint does not comprehensively address any of the specific allegations within the Check-Off Complaint in the above caption matter, defendants deny knowledge or information sufficient to form a belief as to the truth of such specific allegations.

Wherefore, the defendants demand judgment dismissing the above captioned action as against each of them, together with their costs and disbursements.

Dated: New York, New York  
*January 7, 2008*

Yours etc.,

CALLAN, KOSTER, BRADY & BRENNAN, LLP  
Attorneys for Defendants – TRIBECA NORTH  
END, LLC, BOARD OF MANAGERS OF THE  
HUDSON VIEW EAST CONDOMINIUM,  
HUDSON VIEW EAST CONDOMINIUM

By: 

Vincent A. Nagler ( 6400 )

One Whitehall Street  
New York, New York 10004  
(212) 248-8800

TO: WORBY GRONER & NAPOLI BERN, LLP  
Plaintiffs Liaison  
In Re Lower Manhattan Disaster Site Litigation  
115 Broadway, 12th Floor  
New York, New York 10006  
(212) 267-3700

AO 440 (Rev 10/93) Summons in a Civil Action - SDNY WEB 4/99

# United States District Court

Southern

DISTRICT OF

New York

ANDRZEJ BORKOWSKI

## SUPPLEMENTAL SUMMONS IN A CIVIL CASE

V.

CASE NUMBER: (AKH)  
07CV1472

100 CHURCH, LLC, ET. AL.,

SEE ATTACHED RIDER,

TO: (Name and address of defendant)

SEE ATTACHED RIDER

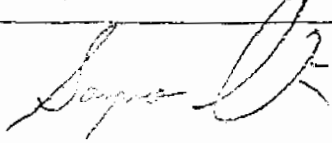
**YOU ARE HEREBY SUMMONED** and required to serve upon PLAINTIFF'S ATTORNEY (name and address)

WORBY GRONER EDELMAN & NAPOLI BERN, LLP  
115 Broadway, 12th Floor  
New York, New York 10006  
212-267-3700

an answer to the complaint which is herewith served upon you, within 30 days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint. You must also file your answer with the Clerk of this Court within a reasonable period of time after service.

**J. MICHAEL McMAHON**

CLERK



(BY) DEPUTY CLERK

DATE

SEP 20 2007

**RIDER**

ANDRZEJ BORKOWSKI,

Plaintiffs,

- against -

100 CHURCH, LLC, ALAN KASMAN DBA  
KASCO, AMBIENT GROUP, INC., AMERICAN  
EXPRESS BANK, LTD, AMERICAN EXPRESS  
COMPANY, AMERICAN EXPRESS TRAVEL  
RELATED SERVICES COMPANY, INC.,  
BATTERY PARK CITY AUTHORITY, BFP  
TOWER C CO. LLC., BFP TOWER C MM LLC.,  
BLACKMON-MOORING-STEAMATIC  
CATASTOPHE, INC. D/B/A BMS CAT, BOARD  
OF MANAGERS OF THE HUDSON VIEW EAST  
CONDOMINIUM, BROOKFIELD FINANCIAL  
PROPERTIES, INC., BROOKFIELD FINANCIAL  
PROPERTIES, LP, BROOKFIELD PARTNERS,  
LP, BROOKFIELD PROPERTIES  
CORPORATION, BROOKFIELD PROPERTIES  
HOLDINGS INC., CUNNINGHAM DUCT  
CLEANING CO., INC., ENVIROTECH CLEAN  
AIR, INC., FGP 90 WEST STREET INC., GPS  
ENVIRONMENTAL CONSULTANTS, INC.,  
HARRAH'S OPERATING COMPANY, INC.,  
HILTON HOTELS CORPORATION, HUDSON  
VIEW EAST CONDOMINIUM, HUDSON VIEW  
TOWERS ASSOCIATES, INDOOR AIR  
PROFESSIONALS, INC., INDOOR  
ENVIRONMENTAL TECHNOLOGY, INC.,  
KASCO RESTORATION SERVICES CO., KIBEL  
COMPANIES, LAW ENGINEERING P.C.,  
LEHMAN BROTHERS HOLDINGS INC.,  
LEHMAN BROTHERS, INC., LEHMAN  
COMMERCIAL PAPER, INC., MCCLIER  
CORPORATION, MERRILL LYNCH & CO,  
INC., NYSE INC., R Y MANAGEMENT CO.,  
INC., ROYAL AND SUNALLIANCE  
INSURANCE GROUP, PLC, RY  
MANAGEMENT, STRUCTURE TONE (UK),  
INC., STRUCTURE TONE GLOBAL SERVICES,  
INC., THE NEW YORK CITY DEPARTMENT  
OF EDUCATION, THE NEW YORK CITY  
SCHOOL CONSTRUCTION AUTHORITY,  
TRAMMELL CROW COMPANY, TRAMMELL  
CROW CORPORATE SERVICES, INC., TRC  
ENGINEERS, INC., TRIBECA NORTH END,  
LLC, TUCKER ANTHONY, INC., WESTON

SOLUTIONS, INC., WFP RETAIL CO. G.P.  
CORP., WFP RETAIL CO.L.P., WFP TOWER A  
CO., WFP TOWER A CO. G.P. CORP., WFP  
TOWER A. CO., L.P., WFP TOWER D CO. G.P.  
CORP., WFP TOWER D HOLDING CO. I L.P.,  
WFP TOWER D HOLDING CO. II L.P., WFP  
TOWER D HOLDING I G.P. CORP., WFP  
TOWER D. CO., L.P., AND ZAR REALTY  
MANAGEMENT CORP., ET AL

Defendants. X